

Hello,

I am a scrimshaw artist and own a retail store in Newport, RI selling scrimshaw, ivory antiques and ancient ivory since 1986. I feel the current regulations on the importation of endangered species products is a good law that could be improved with stronger penalties and tighter enforcement. Focus on the source of the problem, poaching in Africa. A possession ban on ivory is impractical and very short sighted, it will do nothing to protect an elephant from poaching.

I am very concerned that your bill will also ban the possession of ancient woolly mammoth ivory, an extinct species currently with no restrictions on its use anywhere in the world. We work with mammoth ivory found in Alaska and Siberia and contrary to some misinformation I have read, it is easily distinguished from elephant ivory often by its color but also from the angle of the Schreger lines. Fish and Wildlife has as publication listed on its website explaining in detail how to identify ivories from various animals.

http://www.fws.gov/lab/ivory_natural.php#elephant. In addition sperm whale tooth ivory is currently protected under The Marine Mammals Protection Act and has been since 1973. Scrimshaw, often attributed to being one of only a few American art forms, began with the whalers passing time engraving on whale teeth.

A total ban on all ivories would all but eliminate the truly American art of scrimshaw. As a working scrimshaw artist in a retail environment for many years I am often thanked by visitors for keeping this dying art form alive and I take great pride in my work and art form. I along with my brothers Daniel and Gary and colleague Barbara Cullen, who also are scrimshaw artists operate several stores and we do our best to educate the general public on the art, the laws and the materials we use. Recently I started a new wholesale business with my 28 year old son, Ben, in which we sell magnificently carved mammoth ivory figurines to retail stores in your state and throughout the US. A ban on mammoth ivory would shut down that new business without any benefit to the goal of stopping elephant ivory trafficking. I would appreciate it if you would take a look at our web site, you will find us at www.scrimshanders.com.

In conclusion, please consider the history and artistic beauty of ivory and especially focus on the goal of protecting the elephant but not at the expense of an American art form and antique ivory collections.

Respectfully,

Brian J. Kiracofe

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